

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SHARON ORTIZ ALAMO

DEBTOR

CASE NO. 21-01666/MCF

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME
TO REPLY TO *TRUSTEE'S MOTION TO DISMISS*, DOCKET NO. 27**

TO THE HONORABLE COURT:

NOW COMES, SHARON ORTIZ ALAMO, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On October 22, 2021, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 27, alleging that the Debtor has defaulted in her Plan payments in the sum of \$1,916.00.

2. The Debtor hereby respectfully submits that on October 14, 2021, she made one (1) payment of \$1,440.00 (check no. 20039402), registered with the Trustee on November 1, 2021. Attached is copy of *Trustee's Financial Summary* as evidence of said payment made to the Trustee. Although this new payment does not cover all the arrears the Debtor is in the process of obtaining the monies to cure the balance in the plan arrears.

3. The Debtor is still in arrears in the Plan payments and the Debtor respectfully proposes to cure these arrears within thirty (30) additional days.

4. Based on the aforementioned, the Debtor respectfully requests an additional extension of time of thirty (30) days within to cure the balance owed on the Plan arrears and inform the Court, accordingly. This extension of time to expire on December 3, 2021.

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WHEREFORE, the Debtor, through her undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to her address of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 3rd day of November, 2021.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787- 744-7699/787-963-7699
Email: rfc@rfigueroalaw.com

FINANCIAL SUMMARY - CASE 21-01666

SHARON ORTIZ ALAMO paying \$479.00 MONTHLY

Receipts Rcpts/Deb Refunds Disbursements Adjustments Trustee Disb Trustee Adj Show All

Limits: Select Start Date Select Claim ID Select Payee Name Check Status: Cleared Stale Dated Stop Payment Cancelled Voided Outstanding

| Date | Payee | Payee Name | Source / Check | Description | Receipts | Disbursements | Balance |
|-----------|-------|------------|-----------------|---|------------|---------------|---------|
| 11/1/2021 | | | 000000020039402 | DEBTOR PAYMENT REMITTED BY EMPLOYER DEDUCTION-FTB | \$1,440.00 | | |
| 8/13/2021 | | | | EPay NSF Linking | (\$958.00) | | |
| 8/10/2021 | | | | EPAY-Regular Plan Payment | \$958.00 | | |
| Totals: | | | | | \$1,440.00 | \$0.00 | |